

1 Michael Tenenbaum, Esq. (No. 186850)
2 *mt@post.harvard.edu*
3 THE OFFICE OF MICHAEL TENENBAUM, ESQ.
4 1431 Ocean Ave., Ste. 400
5 Santa Monica, CA 90401
6 Tel (424) 246-8685
7 Fax (424) 203-4285

8 *Counsel for Plaintiff International Fur Trade Federation*

9
10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13
14 INTERNATIONAL FUR TRADE
15 FEDERATION, an unincorporated association;

16 Case No. 3:20-cv-00242-RS

17 Plaintiff,

18 – against –

19 CITY AND COUNTY OF SAN FRANCISCO;
20 and

21 **STIPULATION AND [PROPOSED]
22 ORDER RE IFF'S COMBINED
23 OPPOSITION TO MOTIONS TO DISMISS**

24 DR. GRANT COLFAX, an individual, in his
25 official capacity as Director of the San
26 Francisco Department of Public Health;

27 Defendants,

28 and

THE HUMANE SOCIETY OF THE UNITED
STATES; and

ANIMAL LEGAL DEFENSE FUND;

Intervenor-Defendants

1 Plaintiff International Fur Trade Federation (“IFF”), Defendants City and County of San
2 Francisco and Grant Colfax (“Defendants”), and Intervenor-Defendants The Humane Society of the
3 United States and Animal Legal Defense Fund (“Intervenors”) (collectively, the “Parties”), hereby
4 stipulate as follows:

5 WHEREAS, on April 24, 2020, the Court entered an order (Dkt. 29) approving the Parties’
6 stipulation regarding, *inter alia*, the briefing schedule on both Defendants’ and Intervenors’ motions to
7 dismiss (Dkts. 30 & 33);

8 WHEREAS such briefing schedule contemplated that IFF would file an opposition to
9 Defendants’ motion to dismiss by May 25, 2020, and a *separate* opposition to Intervenors’ motion to
10 dismiss by June 1, 2020 (Dkt. 29);

11 WHEREAS, in the interest of avoiding the duplication of effort for the Court (and for itself)
12 that filing two separate opposition briefs would entail, IFF has elected to file a single brief containing
13 its combined opposition to both Defendants’ and Intervenors’ motions, which it filed on May 27, 2020
14 (Dkt. 39) (Tenenbaum Decl. ¶ 2);¹

15 WHEREAS, while IFF was able to combine its opposition to both motions (which motions
16 were 24 and 15 pages, respectively), and would have been able to take up to 25 pages to oppose each
17 in separate briefs under Civil L.R. 7-3(a), IFF’s combined opposition is 29 pages, which exceeds the
18 ordinary page limit for a single brief (*id.* ¶ 3); and

19 WHEREAS the previously stipulated due date for Defendants’ and Intervenors’ reply briefs is
20 June 18, 2020, which is over a month before the July 23, 2020, hearing on the Parties’ motions, and
21 the Parties agree to Defendants’ and Intervenors’ request for an additional day for their replies in light
22 of the foregoing (*id.* ¶ 4);

23 NOW, THEREFORE, the Parties further stipulate and respectfully request that the Court for
24 good cause enter an order approving their stipulation as follows:

25 1. IFF’s combined opposition (Dkt. 39) to Defendants’ and Intervenors’ motions to

26 ¹ Such filing on May 27, 2020, is five days earlier than the previously stipulated due date as to
27 Intervenors’ motion but, on account of the additional time IFF required to combine its opposition, two
28 days later than the stipulated due date as to Defendants’ motion — as to which neither Defendants nor
Intervenors objects.

1 dismiss is accepted for filing without objection to its timeliness or length.

2. Defendants shall have until June 19, 2020, to file their replies.

3 Dated: May 28, 2020

/s/ Michael Tenenbaum

4 Michael Tenenbaum, Esq.
5 *mt@post.harvard.edu*

6 THE OFFICE OF MICHAEL TENENBAUM, ESQ.

7 *Counsel for Plaintiff International Fur Trade Federation*

8 Dated: May 28, 2020

/s/Aileen M. McGrath*

9 Aileen McGrath, Esq.
10 *aileen.mcgrath@sfcityatty.org*
11 DENNIS J. HERRERA, CITY ATTORNEY

12 *Attorneys for Defendants City and County of San
Francisco; and Dr. Grant Colfax, an individual, in his
official capacity as Director of the San Francisco
Department of Public Health*

15 Dated: May 28, 2020

/s/ Bruce A. Wagman*

16 Bruce A. Wagman, Esq.
17 *BWagman@rshc-law.com*
18 RILEY SAFER HOLMES & CANCILA LLP

19 *Attorneys for Intervenor-Defendants The Humane Society
of the United States and Animal Legal Defense Fund*

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated: May __, 2020

24 _____
25 Hon. Richard Seeborg
26 United States District Judge

27 * Pursuant to Civil L.R. 5-1(i)(3), the filer of this document attests that concurrence in the filing
28 of the document has been obtained from each of the other electronic signatories hereto.